

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

**THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,
as representative of**

**PROMESA
TITLE III
Case No. 17-BK-3283
(LTS)**

**THE COMMONWEALTH OF PUERTO RICO, et al.,
THE EMPLOYEES' RETIREMENT SYSTEM
OF THE GOVERNMENT OF
THE COMMONWEALTH OF PUERTO RICO,
AND THE PUERTO RICO
PUBLIC BUILDINGS AUTHORITY**

Debtors¹

**DEMETRIO AMADOR INC./DEMETRIO AMADOR ROBERTS ("AMADOR")
JOINDER TO FINCA MATILDE, INC.'S OMNIBUS OBJECTION FILED
AT DOCKET 19608**

**TO THE HONORABLE UNITED STATES DISTRICT COURT
JUDGE LAURA TAYLOR SWAIN:**

**COMES NOW, CREDITOR DEMETRIO AMADOR INC. / DEMETRIO AMADOR
ROBERTS, ("AMADOR"),** through the undersigned attorney to respectfully state its
objection to the Corrected Response of the Financial Oversight and Management Board in

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566- LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

compliance with the Memorandum Order Regarding Certain Aspects of the Motion for Confirmation of Modified Eight Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al. filed by the Financial Oversight and Management Board at docket entry 19574 and related documents filed on December 21, 2021 by the Financial Oversight and Management Board. In support of its objection, Amador respectfully states its Joinder with the Objection filed by Finca Matilde Inc.

1. AMADOR has filed pleadings at docket entries 17005, 18582, 19228, 19404 and at the closing argument, objecting the treatment and classification under the terms of the Modified Eight Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al.
2. AMADOR has always asserted that as a Takings Clause Claimant, its claim must be classified as a non-dischargeable and unimpaired claim mandating payment in full under its constitutional rank under the Fifth Amendment.
3. AMADOR joins the relief sought in the Objection filed by Finca Matilde requesting that this Honorable Court denies the approval of the Revised Proposed FFCL and Revised Proposed Order, that it denies confirmation of the Revised Plan, and that the Oversight Board's Response in compliance with the Memorandum Order is also denied.
4. AMADOR reserves its rights to raise additional arguments beyond those included in Finca Matilde's Objection supplementing this Joinder.

WHEREFORE, AMADOR respectfully prays for this Honorable Court to deny the approval of the Revised Proposed FFCL and Revised Proposed Order, that it denies confirmation

of the Revised Plan, and that the Oversight Board's Response in compliance with the Memorandum Order is also denied.

I HEREBY CERTIFY, that on this same date I electronically filed the foregoing with the Clerk of the Bankruptcy Court using the CM/ECF system, which will send electronic notification to all participants.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 23rd day of December 2021.

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